

Fill in this information to identify the case:

Debtor 1 Desiree E. Rhymer

Debtor 2
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 18-04471 HWV**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: Lakeview Loan Servicing LLC

Court claim no. (if known): 14-2

Last 4 digits of any number you use to identify the debtor's account: 4102

Property address:

114 Reynolds Rd
Albrightsville, PA 18210**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____**Part 3: Postpetition Mortgage Payment**

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 11 / 01 / 2023

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$ _____

c. **Total.** Add lines a and b.

(c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Denise Carlon
Denise Carlon
30 Oct 2023, 16:57:33, EDT

Date 10/30/2023

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Desiree E. Rhymer aka Desiree E.
Rhymer-Wood aka Desiree Elizabeth
Rhymer aka Desiree Rhymer-Wood aka
Desiree Elizabeth Rhymer-Wood aka
Desiree E. Wood**

Debtor(s)

Lakeview Loan Servicing LLC

Movant

vs.

**Desiree E. Rhymer aka Desiree E.
Rhymer-Wood aka Desiree Elizabeth
Rhymer aka Desiree Rhymer-Wood aka
Desiree Elizabeth Rhymer-Wood aka
Desiree E. Wood**

Debtor(s)

Jack N. Zaharopoulos,

Trustee

BK NO. 18-04471 HWV

Chapter 13

Related to Claim No. 14-2

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Denise Carlon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on October 31, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)

Desiree E. Rhymer aka Desiree E. Rhymer-Wood
aka Desiree Elizabeth Rhymer aka Desiree
Rhymer-Wood aka Desiree Elizabeth Rhymer-
Wood aka Desiree E. Wood
114 Reynolds Road
Albrightsville, PA 18210

Trustee (via ECF)

Jack N. Zaharopoulos
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Attorneys for Debtor(s) (via ECF)

Robert J. Kidwell, III
Newman Williams
712 Monroe Street
Stroudsburg, PA 18360

Vincent Rubino, Esq.
Newman Williams Mishkin Corveleyn et al 7
712 Monroe Street , P.O. Box 511
Stroudsburg, PA 18360-0511

Method of Service: electronic means or first-class mail.

Dated: October 31, 2023

/s/ Denise Carlon

Denise Carlon Esquire
Attorney I.D. 317226
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322

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